UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

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INDICTMENT CR 11-369 JNE/JJG
                             )
UNITED STATES OF AMERICA,
              Plaintiff,
                                ) (18 U.S.C. § 2)
                                    (18 U.S.C. § 2113(a))
                                    (18 U.S.C. § 2113(d))
             v.
                                    (18 U.S.C. § 924(d))
                                    (18 U.S.C. § 981(a)(1)(C))
(1) LAWRENCE DEANGELO
                                 )
                                    (28 U.S.C. § 2461(c)
   WILLIAMSON,
(2) BOYD JEROME MORSON, II,
              Defendants.
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THE UNITED STATES GRAND JURY CHARGES THAT:

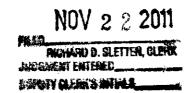
COUNT 1 (Armed Bank Robbery)

On or about October 26, 2011, in the State and District of Minnesota, the defendants,

LAWRENCE DEANGELO WILLIAMSON, and BOYD JEROME MORSON, II,

each aiding and abetting the other, did knowingly, by force, violence, and intimidation, take from the person and presence of a victim teller approximately \$13,500 in United States currency belonging to and in the care, custody, control, management, and possession of the First Minnesota Bank located in Champlin, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a handgun, in violation of Title 18, United States Code, Section 2113(d).

SCANNED
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U.S. DISTRICT COURT MPLS



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FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(3) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

As a result of the offense alleged in Count 1 of this Indictment, defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2861(c), any firearm or ammunition involved in or used in any knowing violation of Sections 2113(a) and 2113(d), including a firearm, namely a Beretta 92FS, 9mm pistol, serial number BER 246254, all in violation of Title 18, United States Code, Sections 924(d)(3), 2113(a) and 2113(d).

In addition, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 2113(a) and 2113(d).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21,

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United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 981(a)(1)(C), 2113(a) and 2113(d), and Title 28, United States Code, Section 2461(c).

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Δ	TRIE	RILL

UNITED STATES ATTORNEY FOREPERSON